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Federal Communications Commission  
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Washington, DC 20554

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Vice President, High Cost & Low Income Division  
Universal Service Administrative Company  
2000 L Street, NW, Suite 200  
Washington, DC 20036

Regulatory Commission of Alaska  
701 West Eighth Avenue, Suite 300  
Anchorage, Alaska 99501-3469

RE: Annual Reporting for High-Cost Recipients Pursuant to 47 C.F.R Section  
54.313, WC Docket No. 10-90

To the Filing Representatives:

This filing is made pursuant to 47 C.F.R. § 54.313 Annual reporting requirements for high-cost recipients. Interior Telephone Company hereby submits this Report and Affidavit.

Interior Telephone Company made similar filings with the State of Alaska on March 30, 2012 in compliance with Regulatory Commission of Alaska 3 AAC 53.460 Requirement to Provide Common Carrier Detail as a Designated Eligible Telecommunications Carrier.

Any questions or inquiries the Commission or Staff may have concerning this filing may be addressed directly to:

Robert W. Dunn  
TelAlaska, Inc.  
201 E 56th Avenue  
Anchorage, AK 99518  
(907) 563-2003

Submitted this 25<sup>th</sup> day of June, 2012.

By 

Robert W. Dunn  
Director of Regulatory Affairs

NetWorks

Interior Telephone

Mukluk Telephone

Cellular

Eyecom Cable

Long Distance

**TelAlaska**

201 E. 56th Ave.  
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an  
**American Broadband**  
company

# **INTERIOR TELEPHONE COMPANY**

## **Annual 54.313 Report of High-Cost Recipient**

(a) Any recipient of high-cost support shall provide:

(2) Detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect

(i) At least ten percent of the end users served in a designated service area; or

(ii) A 911 special facility, as defined in 47 CFR 4.5(e).

Interior Telephone Company (ITC) had one qualifying outage to report during the prior calendar year January 1, 2011 through December 31, 2011. See Exhibit A.

(3) The number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. The carrier shall also detail how it attempted to provide service to those potential customers;

There have been no instances during the prior calendar year January 1, 2011 through December 31, 2011 subject to facility availability.

ITC works with its customers to extend facilities where feasible.

(4) The number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year;

Interior Telephone Company received no known complaints reported to the Regulatory Commission of Alaska and no complaints reported to the Federal Communications Commission for its study area serving 6,154 lines.

(5) Certification that it is complying with applicable service quality standards and consumer protection rules;

Interior Telephone Company certifies that it is in compliance with applicable consumer protection and service quality standards as set forth in Alaska Administrative Rules 3 AAC 53.450 and consumer protection rules as defined in 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted and new hires are instructed on the programs as required by their job functions. See Certification at Exhibit B.

# INTERIOR TELEPHONE COMPANY

## Annual 54.313 Report of High-Cost Recipient

(6) Certification that the carrier is able to function in emergency situations as set forth in §54.202(a)(2);

Interior Telephone Company certifies that it has and will continue to take steps to remain functional in emergency situations in compliance with requirements set forth in 47 CFR 54.202(a)(2).

ITC has ten telecommunication local exchange serving areas. It uses (central office) switches from several different manufacturers (vendors) to provide the service. The manufacturers include Redcom, Metaswitch, Genband (formerly Nortel) and Lucent. Additionally, several of its serving areas have remote nodes. The node manufacturers include Calix (formerly Occam) and AFC. Each central office and interconnecting network equipment site contains provisions for reserve power to keep all equipment operating without interruption for at least eight hours at the busy-hour load following any failure of the primary electric power source. All switches and nodes have 8 hour battery back-up. Additionally, the switches have back-up generators which will provide power indefinitely.

At eight of ITC's local exchange service areas, it provides a stand-alone switch (not connected to other central offices) directly connected to two separate IXCs. There are separate cable routes to each IXC. If either route is damaged access to long distance is attainable through a dial around process. At two of its local exchange service areas, it connects to IXCs on a collapsed SONET ring. All of ITC's switches are non-blocking blocking and capable of handling traffic spikes resulting from emergency situations.

Interior Telephone Company has established procedures to be followed by its employees in the event of emergencies.

See Certification at Exhibit B.

(h) *Additional voice rate data.* All incumbent local exchange carrier recipients of high-cost support must report all of their flat rates for residential local service, as well as state fees as defined pursuant to §54.318(e) of this subpart. Carriers must also report all rates that are below the local urban rate floor as defined in §54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of January 1.

### Voice rate data

Residential Local Service Rate -	\$20.35
State Subscriber Line Charges	\$3.75
State Universal Service Fee	9.5%

Interior Telephone Company has no rates below the local urban rate floor of \$10.00 in 2011.

EXHIBIT A

R.C.A.  
RECEIVED

12 JAN -6 PM 12: 05

Jan. 4<sup>th</sup>, 2012

Regulatory Commission of Alaska  
701 West 8<sup>th</sup> Avenue, Suite 300  
Anchorage, AK 99501-3469

RE: Network Outage Notification

Dear Commission:

Pursuant to 3 AAC 52.320(b), Interior Telephone Company (ITC) is submitting notification of a service outage.

Exchange: Illiamna

Date: Dec. 23<sup>rd</sup> 2011, services fully restored on Dec. 27<sup>th</sup>, 2011

Problem: Plant facilities damaged

Cause: Non-telecom related contractor operating heavy equipment  
accidently destroyed ITC cross connect pedestal that feeds  
Newhalen

Subscribers: 89

Solution: Technician made emergency splices and restored service.  
Permanent replacement of the pedestal will occur when ground  
thaws.

If additional information is necessary, please contact me at (907) 563-2003.

Sincerely,



Robert W. Dunn  
Regulatory Affairs Director

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Annual 54.313 Report of High-Cost Recipient

## Exhibit B - Certifications

In compliance with the following regulations, Interior Telephone Company, by

Brenda Shepard its CEO hereby certifies, subject  
Name Title

to the penalties for false statements imposed under 18 U.S.C. § 1001, that:

47 CFR § 54.313(a)(5) – It will make reasonable efforts to comply with applicable service quality standards as stated in the Alaska Administrative Code 3 AAC 53.450 and consumer protection rules as defined in 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft.

47 CFR § 54.313(a)(6) – It will make reasonable efforts to function in emergency situations as set forth in 47 CFR §54.202(a)(2). ). It has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

Certified by:

Brenda Shepard  
Signature

Brenda Shepard  
Printed Name

CEO  
Title